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EPA - Office of Pesticide Programs (7504P)
One Potomac Yard, Room S-4900
2777 S. Crystal Drive
Arlington, VA 22202

Attn: Venus Eagle,
Product Manager Team 1
Registration Division, Insecticide-Rodenticide

**Subject: Fast Track Label Amendment – response to Bradbury Letter
- Merit 75 WP Insecticide (EPA Reg. No. 432-1314)**

September 26, 2013

Dear Ms. Eagle

Bayer CropScience
P. O. Box 12014
2 TW Alexander Drive
Research Triangle Park
NC 27709
Tel: 919 549-2000

This application for a Fast Track Label Amendment for Merit 75 WP Insecticide (Reg. No. 432-1314) is being submitted in response to the Agency letter (Bradbury to Registrants of Nitroguanidine Neonicotinoid Products) dated August 15, 2013.

With the Merit 2F Insecticide (Reg. No. 432-1312) label serving as guide for previously agreed upon label revisions with the Agency, listed below are the revisions made to this Merit 75 WP Insecticide label.

1. Per Bradbury letter: (a) added Pollinator Protection Box; (b) added pollinator protection language under "Directions for Use"; and (c) replaced "visiting" with "foraging".
2. To clarify which use patterns are impacted by the pollinator protection language, format changes were made such as (a) addition of clarifying Headers; (b) two separate Directions for use boxes for turfgrass use in residential, commercial, and industrial areas and for use on sod farms; (c) use on interiorscape was placed in a separate box.
3. In an effort to improve clarity and ease of use of the label the following changes were made (a) Restrictions previously listed towards the end of the label and other appropriate pollinator restrictions were placed under specific use patterns as applicable; (b) for non-agricultural use patterns the Header "Crop" was replaced with "Site"; (c) "Flowers and Groundcovers" was replaced with "Ground Treatment Pre-Planting" and corresponding directions that are not applicable were deleted; (d) added statements detailing where product are to be used; (e) added referral statements to the pollinator protection language under "Directions for Use".
4. As you had requested, we also corrected inadvertent errors/omissions on this label such as (a) added "Insecticide" to product name as it occurs throughout label and (b) added missing PHI for use on pecans.



The following documents are enclosed in support of this application:

1. Completed EPA Form 8570-1
2. Electronic copy of the amended product label plus a copy with tracked revisions.

Please do not hesitate to call (919-549-2428) or e-mail me (norma.pangilinan@bayer.com), if you have any questions.

Sincerely,

BAYER ENVIRONMENTAL SCIENCE
A DIVISION OF BAYER CROPSCIENCE

A handwritten signature in black ink, which appears to read "Norma C. Pangilinan".

NORMA C. PANGILINAN, Ph.D,
Registrations Manager



United States
Environmental Protection Agency
Washington, DC 20460

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Registration
Amendment
Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 432-1314	2. EPA Product Manager Venus Eagle	3. Proposed Classification <input type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Merit 75 WP Insecticide	PM# 1	
5. Name and Address of Applicant (Include ZIP Code) Bayer Environmental Science 2 T. W. Alexander Drive Research Triangle Park, NC 27709 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input checked="" type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Revise label in response to the Agency letter (Bradbury to Registrants of Nitroguanidine Neonicotinoid Products) dated August 15, 2013. Please refer to cover letter for list of detailed revisions to label.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Metal <input type="checkbox"/> Plastic <input type="checkbox"/> Glass <input type="checkbox"/> Paper <input type="checkbox"/> Other (Specify) _____	
* Certification must be submitted		If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt	No. per container
3. Location of Net Contents Information <input type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container		5. Location of Label Directions <input type="checkbox"/>	
6. Manner in Which Label is Affixed to Product <input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____			

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)					
Name NORMA C. PANGILINAN		Title Manager, Registrations		Telephone No. (Include Area Code) 919-549-2428	
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					6. Date Application Received (Stamped)
2. Signature 		3. Title Manager, Registrations			
4. Typed Name Norma C. Pangilinan, Ph.D.		5. Date September 26, 2013			